IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN

PRIORITIES USA, RISE INC., and THE DETROIT/DOWNRIVER CHAPTER OF THE A. PHILIP RANDOLPH INSTITUTE,

Case No. 19-cv-13341

HON. STEPHANIE DAWKINS DAVIS

MAGISTRATE JUDGE KIMBERLY G. ALTMAN

Plaintiffs,

v.

DANA NESSEL, in her official capacity as Attorney General of the State of Michigan,

Defendants

and

THE MICHIGAN SENATE, THE MICHIGAN HOUSE OF REPRESENTATIVES, THE MICHIGAN REPUBLICAN PARTY and THE REPUBLICAN NATIONAL COMMITTEE,

Intervening-Defendants.

THE MICHIGAN HOUSE OF REPRESENTATIVES AND MICHIGAN SENATE'S INITIAL WITNESS LIST

Pursuant to this Court's September 3, 2021 Case Management Order (ECF No. 110), the Michigan House of Representatives and Michigan Senate ("the Legislature") submits the following for its initial list of witnesses that it may call at trial:

- 1. Guy Cecil, Priorities USA.
- 2. Maxwell Lubin, Rise, Inc.
- 3. Andrea Hunter, Detroit/Downriver Chapter of the A. Philip Randolph Institute.
- 4. Andy Didorosi, The Detroit Bus Company.
- 5. Any expert witness deemed necessary during discovery (to be identified at the time set forth for expert disclosures).
- 6. All witnesses listed by other parties in this litigation.
- 7. All witnesses necessary to identify or authenticate documents.
- 8. All persons deposed before trial.
- 9. All persons identified in any party's discovery responses or in any document produced in discovery.
- 10. All necessary rebuttal witnesses.
- 11. Such persons whose identities become known during discovery.

The Legislature reserves the right to amend its Witness List up to the time of trial.

Date: October 4, 2021 Respectfully submitted,

By: /s/ Roger P. Meyers Roger P Meyers (P73255) Bush Seyferth PLLC 100 W. Big Beaver Rd. Troy, MI 48084 (248) 822-7800 meyers@bsplaw.com

Attorneys for The Michigan Legislature